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January 15, 2008

Via Hand Delivery

FILED

The Honorable Jan E. Dubois
United States District Court for the Eastern District of Pennsylvania
United States Courthouse
601 Market Street, Room 12613
Philadelphia, PA 19106-1721

JAN 21 2008

MICHAEL E. KUNZ, Clerk
By  Dep. Clerk

Re: Securities and Exchange Commission v. Liberty, et al.
No. 06-1030

Dear Judge Dubois:

The parties in the above action have had somewhat protracted settlement discussions due to the defendant's retention of a forensic accountant to analyze his rather complicated assets and liabilities. Both sides agree, however, that the retention of this accountant has greatly assisted the parties' settlement discussions.

While the discussions have been productive, both sides agree that an extension of the current January 28, 2008 fact discovery deadline by 60 days should allow the parties the time to finalize their discussions and hopefully reach a settlement of the matter.

Respectfully,


Jay A. Dubow

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cc: Kingdon Kase, Esquire
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